

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	Criminal No. 05-CR-30017-MAP
)	
CARLOS MARRERO,)	
Defendant)	

DEFENDANT'S MOTION FOR CONDITIONAL RELEASE

Defendant Carlos Marrero hereby moves the Court to establish conditions for his release pursuant to 18 U.S.C. § 3142 (c). For the reasons set forth in the accompanying Memorandum and Exhibits, the Defendant asserts that the following conditions will reasonably insure his appearance in this Court and the safety of the community:

1. Defendant will maintain employment with Aldenville Window and notify the probation office immediately if his employment status changes;
2. When not working Defendant will be confined to his residence at 71 Prospect St., Chicopee, Massachusetts. Compliance with this condition will be monitored by electronic bracelet;
3. Defendant will report to the Pretrial Services Officer in person as directed;
4. Defendant shall refrain from excessive use of alcohol or any use of a narcotic drug or other controlled substance. Defendant shall be subject to random urinalysis to insure compliance with this provision;
5. Defendant shall execute an agreement to forfeit his interest in the property located at 71 Prospect Street, Chicopee, Massachusetts, in the event that he fails to appear or otherwise violates his conditional release.

WHEREFORE, Defendant Marrero respectfully requests that the Court enter an order that he be released from custody on the conditions stated herein.

Respectfully submitted,

Dated: June 22, 2005

/s/ C. Jeffrey Kinder
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CERTIFICATE OF SERVICE

I, C. Jeffrey Kinder, hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail/by hand on June , 2005.

/s/ C. Jeffrey Kinder
C. Jeffrey Kinder, Esq.
C. Jeffrey Kinder, Esquire